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ATTORNEY FOR FORD MOTOR CREDIT COMPANY

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

IN RE:	§	
	§	
SPECIALIZED DELIVERY SYSTEMS,	§	CASE NO. 03-46957-DML-7
DEBTOR.	§	
	§	
FORD MOTOR CREDIT COMPANY,	§	
MOVANT	§	
	§	
VS.	§	
	§	A Hearing on the Motion for
SPECIALIZED DELIVERY SYSTEMS	§	Relief from the Automatic Stay
AND SCOTT M. SEIDEL, TRUSTEE	§	or in the Alternative, Request
RESPONDENTS.	§	for Adequate Protection set:
	§	<b>DECEMBER 29, 2003 AT 9:30 A.M.</b>

**MOTION FOR RELIEF FROM THE AUTOMATIC STAY**  
**OR, IN THE ALTERNATIVE, REQUEST FOR ADEQUATE PROTECTION**

TO THE HONORABLE D. MICHAEL LYNN, U.S. BANKRUPTCY JUDGE:

COMES NOW, Ford Motor Credit Company ("Ford"), Movant herein, complaining of Specialized Delivery Systems ("Debtor") and Scott M. Seidel ("Trustee") Respondents herein, and for cause of action would respectfully show the Court as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. §§1334 and 157 and 11 U.S.C. §362. This is a core proceeding.

2. Ford is a secured creditor of the above-referenced Debtor by virtue of a security interest in a 2002 Ford F250, Vehicle Identification Number 3FTNW21F82MA07670.

3. As of November 20, 2003, Debtor herein was indebted to Ford in the net balance amount of \$30,304.53.

4. The monthly payments on the account are \$799.98 each and the account is due for the September 19, 2003 payment and all payments due since that time.

5. Ford demands proof of and maintenance of insurance on the vehicle, listing Ford as loss-payee and otherwise acceptable to Ford. If the vehicle is uninsured, it constitutes cause to terminate the automatic stay.

6. But for the automatic stay, Ford could and would foreclose its lien on the collateral in which it holds a security interest.

7. Ford does not have, and neither Debtor nor the Trustee are able to offer, adequate protection of Ford's interest in the collateral securing Ford's debt.

8. Debtor and Trustee have no equity in the collateral, and the collateral is not necessary for an effective reorganization.

9. Because the Collateral described herein depreciates and may not be insured, any order either terminating or conditioning the automatic stay should be effective immediately and there should be no stay of the order for ten days after the entry of the order.

WHEREFORE, PREMISES CONSIDERED, Ford Motor Credit Company prays for:

1. An Order of this Court granting Ford relief from the automatic stay imposed pursuant to 11 U.S.C. §362;

2. An Order of this Court authorizing Ford to take immediate possession of the collateral which is the subject of this Motion and foreclose its lien on the collateral;

3. In the alternative, an Order of this Court requiring Debtor to provide Ford with adequate protection of its interest in the collateral;

4. An Order of this Court finding that any Order entered with regard to this Motion should be effective immediately upon its entry and should not be stayed for ten days following the entry of said Order; and

5. For such other and further relief, both general and specific, to which Ford may show itself justly entitled.

Respectfully submitted,

/s/ December 9, 2003  
Pamela Arnold Bassel  
State Bar Number 01344800  
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ATTORNEY FOR FORD MOTOR  
CREDIT COMPANY

**NOTICE REGARDING REQUIRED ANSWER**

**THIS SHALL SERVE AS NOTICE TO YOU THAT PURSUANT TO RULE 4001 OF THE LOCAL RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS, THE TRUSTEE (IF ONE HAS BEEN APPOINTED) OR THE DEBTOR MUST FILE AN ANSWER TO ANY MOTION FOR RELIEF FROM THE AUTOMATIC STAY WITHIN TWELVE (12) DAYS FROM THE SERVICE OF THE MOTION.\* THE DEBTOR'S ANSWER SHALL INCLUDE A DETAILED AND COMPREHENSIVE STATEMENT AS TO HOW THE MOVANT CAN BE "ADEQUATELY PROTECTED" IF THE STAY IS TO BE CONTINUED. IF THE DEBTOR DOES NOT FILE AN ANSWER AS REQUIRED, THE ALLEGATIONS IN THE CREDITOR'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY SHALL BE DEEMED ADMITTED, UNLESS GOOD CAUSE IS SHOWN WHY THESE ALLEGATIONS SHOULD NOT BE DEEMED ADMITTED, AND AN ORDER GRANTING THE RELIEF SOUGHT MAY BE ENTERED BY DEFAULT.**

\*Under Bankruptcy Rule 9006(e) service by mail is completed upon mailing; under Bankruptcy Rule 9006(f), three (3) days are added to the period for answer or other response when service is by mail.

**CERTIFICATE OF CONFERENCE**

I, the undersigned, hereby certify that prior to the filing of this Motion, I did the following:

My office contacted Debtors' attorney or Debtors' attorney's assistant and was advised that there is no opposition to the Motion.

/s/ December 9, 2003

Pamela Arnold Bassel

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing Motion for Relief from the Automatic Stay, or in the Alternative, Request for Adequate Protection was served by CERTIFIED MAIL, RETURN RECEIPT REQUESTED on:

David Ebert  
1236 Southridge Court  
Hurst, TX 76053  
**CRR #7002 2410 0004 9663 0235**

Specialized Delivery Systems  
2105 Harwood Road, Suite 215-116  
Bedford, TX 76021  
**CRR #7002 2410 0004 9663 0228**

and by FIRST CLASS MAIL, POSTAGE PREPAID on:

Specialized Delivery Systems  
2105 Harwood Road, Suite 215-116  
Bedford, TX 76021

and by ELECTRONIC FILING on:

Scott Seidel  
1201 Elm St. Suite 2500  
Dallas, TX 75270

Office of the U.S. Trustee  
1100 Commerce, Room 9C60  
Dallas, Texas 75242

on December 9, 2003.

/s/ December 9, 2003

Pamela Arnold Bassel

**SUMMARY OF EXHIBITS**

1. Vehicle Retail Instalment Contract dated November 4, 2001 on a 2002 Ford F250, Vehicle Identification Number 3FTNW21F82MA07670.
2. Certificate of Title on a 2002 Ford F250, Vehicle Identification Number 3FTNW21F82MA07670.

\*Copies of Exhibits are available by written request to:

Kim Raudry  
Law, Snakard & Gambill, P.C.  
1600 W. 7th Street, Suite 500  
Fort Worth, TX 76102

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